

# **ISD Administration of GSRP**

## **The Early Childhood Contact**

As part of administering the Great Start Readiness Program (GSRP), the Intermediate School District (ISD) will designate an Early Childhood Contact (ECC). The ECC is the early childhood leader at the ISD, facilitating an ISD-wide plan with a vision to improve child outcomes, to minimize achievement gaps and help all stakeholders to see the “big picture” of how GSRP strategically fits into the local Great Start Collaborative (GSC) early childhood efforts. The ECC uses the written GSRP philosophy statement as a foundation to partner with the GSRP Early Childhood Specialists (ECS) on data-based decisions for continuous quality improvement. For ISDs with larger populations, the ECC may work with a team to fulfill the responsibilities of the position. For ISDs with smaller populations, the ECC may also serve as the ECS. In this instance, care must be taken to ensure that responsibilities of the ECS, as outlined in the ECS section of this manual, are not compromised.

The ECC ensures that effective systems are in place to support GSRP. ISD administrative policies and procedures document approaches to overarching aspects of the grant, such as community needs assessment, choosing and supporting subrecipients, slot distribution, community partnerships, recruitment, parent engagement, communication, record-keeping, staff credentialing, and program evaluation. Administrative policies and procedures must also address systematic oversight of subrecipient practices.

Written policies and procedures support consistent operational activities over time. Policies and procedures provide clarity when dealing with accountability issues or activities that are of critical importance to the grant and may have serious consequences, e.g., grievance, flow of funding, and submitting reports. Well-written procedures help to minimize misunderstandings by identifying responsibilities and establishing boundaries. All parts of the system are dependent upon one another to function properly and provide the highest level of service to children and families. Head Start can be a valuable resource to understand interrelated and interdependent management systems.

## **Strategic Planning**

Consider the topics below. Written processes for each must be in GSRP administrative files. When systems are implemented well, it is more likely that benefits will occur (i.e., improved quality of learning experiences and, in turn, improved child outcomes). Which portions below are in place or in line with existing practices? How can activities be prioritized to build momentum while systematically strengthening the program? Where is more in-depth evaluation

needed to either demonstrate the effectiveness of efforts or to diagnose potential problems and solutions?

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## **1. Assurances**

ISDs agree to comply with all applicable requirements of State statutes, Federal laws, executive orders, regulations, policies, and award conditions governing GSRP. ISDs understand and agree that if they materially fail to comply with the terms and conditions of the grant award, MDE may withhold funds otherwise due from this grant program, any other federal grant programs, or the State School Aid Act of 1979 as amended, until the ISD as fiscal agent/grantee comes into compliance, or the matter has been adjudicated, and the amount disallowed has been recaptured (forfeited). MDE may withhold up to 100 percent of any payment based on a monitoring finding, audit finding, or pending final report. All current grant assurances can be viewed in the GSRP Acceptance of Funds and Implementation Plan in MEGS+.

## **2. Child Recruitment**

Refer to the *Recruitment and Enrollment* section of this manual for guidance on generating written procedures that align with legislative requirements about recruitment.

The ISD should work with subrecipients to create outreach and recruitment campaigns that can be funded by the 2 percent of the allocation that can be set aside and used for this work. Sharing ideas with other ISDs and adapting or adopting each other's work may make the most efficient use of the funds.

## **3. Closure Procedures**

Closure procedures guide the ISD when a former subrecipient declines to participate in GSRP and in the event a subrecipient contract is terminated. A previous subrecipient that no longer chooses to implement the program must provide written notification to the ISD. Notification must include an inventory of the

equipment and supplies purchased with GSRP funds that are remaining. The subrecipient must arrange to return all remaining equipment and materials to the ISD as the items will be needed for the program to which slots are moved.

There are infrequent instances where a program may close during the school year. Details on terminated contracts are maintained in ISD administrative files. The ISD will lead transitioning activities with the goal to prevent a break in service to children and to minimize distress to children and families.

Considerations include:

- Agreement between parties of what is a reasonable amount of time needed to finalize the closure;
- Confirmed personnel contacts before agency closure, regarding who the ISD will work with for final invoice and payment structure pieces;
- Possible proration of the slot agreement;
- Transfer of child files;
- Transfer of subrecipient administrative files; and
- All remaining reports covering the period of time for which the subrecipient participated.

## **4. Communication**

The ISD must establish and monitor systems to ensure that timely and accurate information is provided among the ISD, subrecipients, parents, policy groups and staff. Consider the following strategies:

Communication with families must be carried out on a regular basis throughout the program year, and carried out in the parent's primary or preferred language, for example:

- Newsletters
- Focus groups or surveys
- Parent-teacher conferences
- Open house events
- Local Parent Advisory Committee and School Readiness Advisory Committee meetings and minutes
- Web site
- Children's progress notes

Communication with local advisory groups and the ISD-wide school readiness advisory committee includes the following information provided on a regular basis:

- Procedures and timetables for program planning
- Policies, guidelines, and other communications from MDE
- Program and financial reports
- Program plans, policies, procedures, grant application.

Communication among staff must include mechanisms for regular communication among all program staff:

- Staff meetings
- Distribution of program quality reports
- Intranet or listserv for internal staff correspondence
- Development of subrecipient plans that includes center operations
- Updates to annual written plans
- Professional learning communities (PLCs)

## **5. Community Needs Assessment and Application**

Legislation requires an annual comprehensive needs assessment using aggregated data from the ISD service area and a community collaboration plan. The ECC must seek endorsement of the plan by the local GSC and ensure that GSRP is part of the community's Great Start strategic plan. The signed GSC Endorsement Form is retained at the ISD. The needs assessment must document:

- Annual data collection on poverty, number of four-year-old children at risk of school failure and existing preschool programming;
- Discussion of data with representatives from each LEA, child care organizations and the GSC;
- Collaborative decisions on the slot request, program options and process to determine preschool sites for the upcoming academic year, and
- The estimated number of eligible children who will remain unserved after the ISD, LEAs and community early childhood programs have met their funded enrollments.

See resources for this section: *GSC Endorsement Guidelines*.

## **6. Community Partnerships**

GSRP administrative policies will reflect the role of the ECC as a trusted, credible leader in the GSC, where a collective impact approach prioritizes early childhood efforts. The ECC identifies and creates connections with administrators of the licensed child care centers in the region. The ECC increases the number of and strengthens partnerships between LEAs, Head Start grantees, child care organizations, municipalities with early learning initiatives, extended-learning programs, and other community-based programs.

It is important to have shared language and understanding of the early learning years, as well as the variety of settings that children are in before transitioning into GSRP and those they will experience after transitioning out of GSRP. Use of shared language, goals, and evaluation should be included in the strategic plan for GSRP and public statements. The ECC will support clear and consistent communication about vertical alignment as a priority in both internal (e.g., district strategic plans, teacher newsletters) and external (e.g., web sites, family newsletters) platforms.

## 7. Fiscal Planning and Review

Each ISD provides written fiscal policies outlining its procedures including:

- Notification of the slot award and the corresponding transportation allocation;
- The process for how and when the slot and transportation budgets are to be submitted;
- The review and approval process of budgets by the ISD;
- The process for budget amendments; and
- The process and timeline for payments to the subrecipient, specifying the documentation required for payment and how it should be submitted.

The ISD should provide professional development to both the subrecipient fiscal and program staff responsible for GSRP.

## 8. Monitoring Subrecipients

Refer to the *Funding* section of this manual for helpful resources to determine how to seek, identify and contract with eligible GSRP subrecipients.

Administrative policies must also reflect how the ISD will provide oversight and monitoring of subrecipient practices, such as local policies/procedures related to:

- Fiscal activities;
- Department of Human Services/Bureau of Children and Adult Licensing (DHS/BCAL), including report of violations;
- Participation in Michigan's Great Start to Quality system;
- Parent engagement;
- Human resources (staff hiring, compliance plans, supervision);
- Professional development for teaching teams, including formal training in the curriculum and child assessment tools in use;
- Participation in the National School Nutrition Program and/or the Child and Adult Care Food Program, as applicable;
- Child enrollment; and
- All program policies identified in the *Classroom Requirements* section of this manual.

## 9. Parent Advisory Committee

Legislation requires GSRP sites to provide for active and continuous participation of parents of enrolled children. Keeping in mind that those most in need of quality public education may feel less well-served by the system, the ECC will champion parents as active decision makers in GSRP, ensuring annual training that instills

confidence in parents as active members. GSRP administrative files must address design and monitoring of GSRP advisory groups.

The ISD ensures that programs have a GSRP parent advisory committee with a focus on local considerations, including recruitment/enrollment, PQA results and child outcome data. This committee minimally meets twice each program year. The committee has one parent representative for every 18 children enrolled in the program, with a minimum of two parents or guardians. The local GSRP parent advisory committee also has representation from the GSRP teaching staff and support of other GSRP administration.

The local GSRP parent advisory committee designates a liaison to the GSC Parent Coalition, working with other committed parents to support early childhood practices in the community. Activities of the GSC Parent Coalition can be shared with the GSRP parent advisory committee in person, virtually (e.g., Skype) or through emailed reports.

Refer to the *Parent Involvement* section of this manual for more information on parent engagement.

## **10. Philosophy**

The ISD will ensure that each subrecipient has a written philosophy statement and must have a process to approve each philosophy statement, determine whether the statements are promoted widely and whether the beliefs documented are used in decision-making. Discrete philosophy statements will have common features that are aligned with the *Early Childhood Standards of Quality for Pre-Kindergarten* (ECSQ-PK), yet will provide for local language to addresses social, economic, cultural, and family needs. See the *Classroom Requirements* section of this manual for additional information on preschool philosophy statements.

## **11. Professional Development**

Administrative policies acknowledge that effective professional development (PD) can improve the instructional coherence among subrecipients and improve the quality of learning opportunities for young children. The planning of PD opportunities is data-driven, ongoing, and part of a long-term continuous improvement plan.

The ECC strengthens local administrative quality by arranging PD for elementary principals, directors of child care organizations, municipalities with early learning initiatives, extended-learning programs, and other community-based organizations. This group is poised for relationship-building and to learn best practices for prekindergarten.

The ECC and the ECS support meaningful PD for teaching teams. The ECS is critical to preschool quality and supports GSRP teaching teams throughout the academic year with expertise in the ECSQ-PK, and status as a reliable assessor in the PQA. Refer to the *Early Childhood Specialist* section of this manual for more information on the ECS position. The ECC will demonstrate innovative efforts to create and standardize time for school- and community-based GSRP teaching teams to work together across different daily, weekly, quarterly, and school year calendars.

ECS need time to reflect on what makes their own professional development work strong, and what hinders it. The ECC engages and supports ECS teamwork by gathering the ECS as a community of learners more than once per year to reflect on the ECS role and responsibilities. The ECC also insures that the ECS is able to attend professional development events, such as curriculum/child assessment training, the Michigan Collaborative Early Childhood Conference and/or the HighScope International Conference.

## **12. Program Evaluation**

The program evaluation plan reflects a discriminating use of data. Data markers include child-based data, classroom-based data, staff surveys and markers of family well-being. Refer to the *Program Evaluation* section of this manual for guidance on generating written procedures that align with grant requirements about evaluation.

## **13. Record-keeping**

ISD administrative procedures must identify where critical grant records are housed and staff position(s) responsible to maintain files. Refer to the *Reporting and Monitoring* section of this manual.

## **14. School Readiness Advisory Committee**

The ECC is a leader in the ISD-wide school readiness advisory committee, established annually and which operates as a workgroup of the local GSC. One of the tasks of the school readiness advisory committee is to annually review and make recommendations about:

- Collaboration with and involvement of community volunteer and/or social service organizations in addressing all aspects of educational disadvantage;
- Partnership with the local GSC, Regional Resource Center, and others to build the capacity of local community agencies to take part in GSRP;
- Collaborative recruitment and enrollment process to assure that each child is enrolled in the program most appropriate to his or her needs and to maximize the use of federal, state, and local funds;
- The choice of an approved curriculum;

- Nutritional services utilizing federal, state and local food program support as applicable;
- Health and developmental screening process;
- Referrals to community social service agencies, as appropriate;
- Parent involvement;
- PQA and Child Outcome data;
- Continuous improvement efforts, and
- Transition into kindergarten.

The advisory committee will also make recommendations to the Great Start Collaborative regarding other community services designed to improve all children's school readiness.

## **15. Sliding Scale of Tuition**

Up to 10 percent of children enrolled throughout the Intermediate School District (ISD) region may be from families above 250% of the federal poverty level (FPL) with extreme risk for low educational achievement as determined by number or severity of GSRP risk factors. These families must be charged tuition calculated on a sliding scale, based on family income.

GSRP slots filled by over-income families are compensated at the current Part-Day or School-Day slot amount. In other words, the sliding scale fee is in addition to the funded slot amount provided by state school aid funds administered by the Michigan Department of Education (MDE). The sample scale provided in the resources to this section may be adopted or amended. Alternately, the ISD may create a sliding scale of tuition. The written policies and procedures and the fee scale were submitted for approval by MDE and need only be resubmitted if amended.

Refer the *Participant Eligibility and Prioritization Flowchart* for additional information on prioritization for enrollment, determining family income and documenting risk factors. The family contribution is the amount, based on a percentage of the family's gross annual income, determined to be a reasonable amount a family should pay toward the cost of GSRP. The pre-calculated fee is a per-child fee, not a per-family fee. Tuition income and related expenditures will not be reported to MDE, but records must be available for review upon request.

## **Option to Serve Additional Children between 250-300 Percent of FPL Over the 10 Percent Cap**

If the ISD determines that all eligible children are being served and that there are no children on the waiting list who live with families with a household income that is equal to or less than 250% of the federal poverty level, the ISD may then enroll



children who live with families with a household income that is equal to or less than 300% of the federal poverty level.

Any ISD utilizing the option to serve more than 10% of children above 250% FPL or greater, must contact the assigned GSRP consultant at MDE and, if requested, be able to provide documentation of due diligence to identify and enroll all children at or below 250% FPL. At a minimum, ISDs must be able to demonstrate:

- Geographic location of GSRP classrooms compared to the population of GSRP eligible children and documentation of attempts to place classrooms in areas of high need;
- Recruitment efforts across the ISD and targeted to areas of high need;
- Enrollment of all identified eligible children below 250% FPL in GSRP or Head Start or documentation of reasons not enrolled; and
- Lack of eligible children at or below 250% FPL on waiting lists for both GSRP and Head Start.

In the event that an ISD is approved to serve children up to 300% FPL, all children enrolled with income up to 300% FPL are then considered to be income eligible in terms of the 10 percent cap. They do however pay tuition according to the established sliding fee scale. That ISD would then be able to fill up to 10% of its slots with children with identified risk factors from families with incomes above 300% FPL.

## Policy

The following policies must be adhered to:

- A. Families whose income falls at or below 250% of FPL pay no tuition for GSRP.
- B. The ISD shall establish a fee schedule for families with incomes greater than 250% of the FPL not to exceed the per-slot allocation.
- C. The ISD shall implement one sliding scale of tuition for all of its GSRP subrecipients.
- D. Part-Day and School-Day GSRP shall charge tuition to enrolled families over 250% of the Federal Poverty Level and shall charge the GSRP fee only for the portion of the day supported by GSRP.
- E. Tuition fees from families must be expended within the fiscal year that they were collected.
- F. Tuition fees must be used to support the GSRP, as defined in the Budget Section of the *GSRP Implementation Manual*.
- G. All Head Start and GSRP policies and regulations are applied to GSRP/Head Start blended slots, with the highest standard from either program adhered to. A Head Start program must not prescribe any fee schedule or otherwise provide for the charging of any fees for participation in the program (HSPS 1305.9). Therefore, children enrolled into the GSRP/Head Start Blend must not be charged tuition.
- H. Children in foster care, those experiencing homelessness, and children with an individualized education program (IEP) recommending placement in an

inclusive preschool setting are automatically eligible for GSRP and should be considered within the lowest quintile (0 – 50% Federal Poverty Level (FPL) for prioritization.

- I. Parents who pay tuition may not incur expenses for other portions of the program, such as meals or transportation.
- J. The number and severity of factors and local prioritization of factors contributing to educational risk must be incorporated into enrollment practices for over-income families. Documentation of the risk factors must be kept in each child's file.
- K. Late payment fees are permitted only to recoup collection costs.
- L. Income and tuition fees are calculated at the time of enrollment. During the academic year, if the family situation changes, families may request a re-calculation of income to determine a lower tuition.

## **ISD Responsibilities**

- A. The ISD shall establish written policies and procedures for the implementation of this fee policy.
- B. An approvable plan will address educational risk, fees and information for families, including invoicing, collection practices and explanations to families about the reasons for tuition fees, and how confidentiality of family information is maintained.
- C. Annually updated copies of the tuition policies and procedures must be included in recruitment materials.
- D. The ISD shall require subrecipients to disseminate tuition policies to enrolled families and program staff, at least in their respective parent handbooks.
- E. Parents must be notified of any upcoming tuition policy-change 30 days prior to the date the change is to take place.
- F. The ISD shall ensure that the fee policy is adhered to by subrecipients.
- G. The ISD must adhere to all policies, above. The ISD has discretion with features such as:
  - a. Determining whether tuition payments are collected and retained at the subrecipient level or the ISD. When billing and procurement are the responsibility of the subrecipient, how tuition income is reported to the ISD;
  - b. Retention of a percentage of tuition income to cover accounting costs;
  - c. Invoicing, including payment schedule, how payments are made and receipt of payment;
  - d. Fee adjustment for advance payment;
  - e. Fee adjustment for two or more enrolled children, absence or hardship. ISDs may assist families in need with alternate funding, scholarships, service agreements, etc.;
  - f. Non-pay grace period and late fees;
  - g. Exclusion for non-payment. If exclusion is permitted, the policy must address strategies to prevent disenrollment, e.g.,

partnerships with service organizations such as Rotary and faith-based organizations as well as scholarships. The policy must also address the process to notify the family, staff, bus driver, and strategies to transition the child into the next setting;

- h. Uses for tuition income, e.g., purchases related to program quality or child development goals, professional development, pooled for ISD distribution as enhanced funds; and
- i. Who parents should call with questions.

H. The ISD sliding fee scale and guidance will be reviewed annually as part of the ISD-wide advisory committee which operates as a workgroup of the local Great Start Collaborative (GSC).

## **16. Slot Distribution**

Involving the local school readiness advisory committee and the GSC in the creation of the slot distribution plan is advised; the GSC works with community partners and is called on annually to endorse the ISD's Community Needs Assessment and Application (CNAA), the first step in the GSRP funding process. The ISD should also partner with the GSC and the local Resource Center (RC) to build capacity for community-based organizations (CBOs) to serve as GSRP sites in future years. GSRP subrecipients must minimally have three of five stars in the Great Start to Quality (GSQ) system unless operating on a provisional license. A program with a provisional license is a new site or relocated site and must enter the system as soon as a regular license is issued. The ISD must work with the program to see that it will be awarded at least three stars at entry.

Legislation requires each ISD to distribute at least 30% of its total allocated slots to CBOs. ISDs unable to distribute 30% of slots to CBOs must demonstrate to MDE the specific steps required in the State Aid Act have been taken to meet the requirement. Detailed information about this process can be found in the Funding section.

Slots distributed to Head Start agencies, even when the Head Start agency is the ISD, contribute to the total slots distributed to community-based partners.

Faith-Based Organizations (FBO) are considered CBOs and as such are counted within the minimum 30% CBO partners for GSRP. FBOs can make strong GSRP partners as they are often well-connected to community agencies that support families. Faith-based subrecipients keep prayers and religious instruction from being a part of a GSRP classroom. In space used for dual purposes, there is no need to remove or cover faith-based displays. These subrecipients do not restrict GSRP enrollment or staff hiring due to faith-based considerations.

Public School Academies (PSA) and Community Education preschools are considered LEA subrecipients. If an open-to-the-public preschool is operated by an LEA, this is also considered an LEA subrecipient. Review the DHS/BCAL child care

license to confirm whether an LEA or a community agency is the licensee. LEA programs are only counted as community-based providers when they are Head Start grantees or Head Start delegates.

Existing subrecipients that have met the variety of quality and administrative benchmarks required of the grant should be able to expect consistency of slots allocated. That is, the ISD may 'hold harmless' existing, strong GSRP partners and should look to community partners and competition between all partners when distributing increased slots.

The ISD must have a written process to distribute GSRP slots that will be fair to all current and potential early childhood partners. The document will reflect policy and procedures to follow each year, with specific consideration of allocating slots to community partners. An approvable process addresses the following:

Review of existing programming and local considerations:

1. Are there current subrecipients that struggle to fill their slots?
2. For current subrecipients, how does the ISD weight classroom quality and grant compliance in hold-harmless determinations?
3. Are there areas of high-need that require additional slots? If so, how will need for services be balanced with quality of programming?
4. Are there Focus or Priority Schools in your ISD that have qualifying children but do not have GSRP? Find the lists of Focus and Priority Schools at: [www.michigan.gov/baa](http://www.michigan.gov/baa).
5. How are subrecipient decisions regarding program options and services addressed? (For example, Part-day vs. School-day, transportation, etc.)
6. Are there administrative issues that would prohibit a program from being funded? (For example, licensing, fiscal capacity, pattern of late or incomplete reporting, etc.)
7. Are there specific local issues that will impact the distribution of slots or that could be addressed through the distribution plan?
8. How does the ISD partner with the local GSC, Resource Center, and others to build the capacity of local community agencies to take part in GSRP in future years?

Planning for the subsequent grant and academic year considering that the ISD will receive contact information for each licensed child care center located in the service area of the intermediate district or consortium by March 1 of each year:

1. What is the timeline for subrecipient selection and slot distribution?
2. In what ways will the ISD reach out to notify each licensed center at least twice to make them aware of the opportunity to become a part of GSRP? One of these notifications may be made electronically, but at least 1 of these notifications must be made via hard copy through the United States mail. At

least 1 of these notifications must be made within 7 days after the ISD receives notice from the department of its slot allocations.

3. How will the ISD provide to each licensed child care center located in the service area of the intermediate district or consortium information regarding GSRP requirements and a description of the application and selection process for community-based providers?
4. How does the ISD give the potential partners contact information for someone who could answer questions during the subrecipient selection and slot distribution process?
5. What programs in the community are prepared either to increase the number of slots received or to begin a GSRP?
6. What is the process for the competitive request for proposals?
  - a. What factors will be considered in selecting subrecipients?
  - b. How will fairness across all eligible entities (LEAs/CBOs) be assured?
  - c. How and when will the ISD share the requirements the potential partner would have to meet to apply and those that would have to be met if chosen? An example would be staff credentialing requirements. Applicants would not have to have compliant staff to apply. They would however have to agree that, if chosen to receive slots, appropriate staff would be hired.
  - d. What is the timeline and process for the ISD to collect pertinent information from potential partners? Refer to resources for this section for a template.
  - e. What is the objective review process to rate/rank proposals?
  - f. What stakeholders make up the team that reviews proposals and makes slot distribution decisions?
  - g. How and when does the ISD will inform potential community partners of the factors the ISD will consider in making its decisions to award slots?
  - h. How and when does the ISD will communicate to those being awarded slots?
  - i. What is the timeline and process for how the ISD will communicate with those applicants not being awarded slots for the grant year and give feedback as to why the decision was made?
7. What process will an entity not awarded slots or an entity awarded a reduced number of slots have to appeal the decision locally and how will they be informed of that process? The essential question for an appeal should be whether the ISD provided the process to award slots in writing and followed its process with fidelity.
8. How will the ISD provide to the public and to participating families a list of community-based GSRP subrecipients with a GSQ rating of at least 3 stars?

## **17. Written Agreements**

A written agreement is required between the ISD and its subrecipients. The agreement must contain the components that form a binding agreement between two or more parties, including an offer, acceptance of that offer and consideration of what each party gives of value that each would not normally be legally obligated to provide. Considerations include:

#### Agreement for Services

1. Each document must clearly report that it is a contract between the ISD and each subrecipient to meet need for Great Start Readiness Program (GSRP) services.
2. The contracts should reflect GSRP requirements including:
  - a. a plan for how the ISD and subrecipients will partner to ensure high-quality implementation of the GSRP (e.g., monitoring, auditing, orientation, mentoring, and hiring and professional development of staff);
  - b. a list of the developmental screening tool, curriculum, child assessment tool used, and how staff will receive training on the full implementation of each of the tools;
  - c. a plan showing partnership in conducting annual program evaluation using the Preschool Program Quality Assessment (PQA) tool, with expectations that each program develops annual plans toward earning a high-quality score on the PQA of 4.5 or higher;
  - d. an explanation of how the subrecipient will be involved in area-wide and local advisory groups, how often the local group will meet each year and how the subrecipient will ensure parent participation at the local level.
3. The contracts should include a general timeline for required GSRP reports and who will be responsible for completion of each report.
4. Describe the ISD's system to seek information from the subrecipient about, provide oversight on, and evaluate the effectiveness of each of the itemized features in the local contracts.
5. Agreements must address impasse or default for parties that do not complete any portion of the agreement. Identify the entity providing the dispute arbiter.

#### Financial Considerations

1. The contract should ensure that administrative funds are not exceeded. It must include a statement regarding the administrative cap for the ISD and subrecipient including the percentage for each and the use.
2. It must also specify whether the ISD will keep the 2 percent for a shared outreach and recruitment campaign or allow the funds to be split with subrecipients. If split, the ISD must provide guidance on how the funds may be used.
3. The contract must report the process for flow of funding; e.g., state the process for the ISD to make monthly payments or reimbursements to the subrecipients and how the ISD will track both revenue and expenses.
4. If the ISD is retaining additional funds to support program quality, services should be specifically documented.

5. The contract must state which financial records the subrecipient is required to submit to the ISD and which it must retain for monitoring purposes. The ISD will also affirm its responsibility to maintain the books, invoices, and financial records necessary for MDE audit.
6. The program option(s) to be implemented must be included: Part-Day, School-Day or GSRP/Head Start Blend.
7. The number of slots to be filled must be included. Any modification to this number must be noted in an addendum.

### Verification of Agreement

The agreement must be signed and dated by both parties. Complete titles, including agency name, must accompany each signature. Contracts between the ISD and subrecipients that are continuing from previous years must be in place by October 1, the start of the grant year. Contracts with new subrecipients must meet this deadline if the program starts at the beginning of the grant year.

## Other Contracts

A written agreement is also required between the ISD and any other party responsible for any GSRP service. The agreement must contain the components that form a binding agreement between two or more parties including; scope of services, defined compensation, a defined period and signatures with titles of all parties involved.

Portions of this section were adapted from:

HHS/ACF/ACYF/HSB (2006). *Tips for Establishing an Effective Communication System*.  
[http://eclkc.ohs.acf.hhs.gov/hslc/tta-system/operations/mgmt-admin/communication/comm-sys/manage\\_fts\\_00023a\\_052006.html](http://eclkc.ohs.acf.hhs.gov/hslc/tta-system/operations/mgmt-admin/communication/comm-sys/manage_fts_00023a_052006.html)

Kauerz, K. & Coffman, J. (2013). *Framework for Planning, Implementing, and Evaluating PreK-3rd Grade Approaches*. Seattle, WA: College of Education, University of Washington.  
[http://depts.washington.edu/ptthu3/PreK-3rd\\_Framework\\_Legal%20paper.pdf](http://depts.washington.edu/ptthu3/PreK-3rd_Framework_Legal%20paper.pdf)

Language Diversity and Literacy Development Research Group. *Lead For Literacy Initiative Memos*.  
<http://isites.harvard.edu/icb/icb.do?keyword=lesaux&pageid=icb.page541445>

The Center for Michigan. January 2013. *The Public's Agenda for Public Education: How Michigan citizens want to improve student learning*. [http://cdn.thecenterformichigan.net/wp-content/uploads/2013/01/Education\\_Report\\_FINAL.pdf](http://cdn.thecenterformichigan.net/wp-content/uploads/2013/01/Education_Report_FINAL.pdf)